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FACTUAL BACKGROUND

[Write a short version of the facts in the Complaint. After each fact, write in the paragraph number of the Complaint where that information can be found.]

PG&E Corporation ("PG&E Corp.") and Pacific Gas and Electric Company (the "Utility"), objections to the Proofs of Claims to be disallowed and expunged from claimant L. C. Chappell should be disallowed. Exhibit 1B page 1, line 3 (\$268,300).

1 **ARGUMENT**

2 *[Explain your response to each of Defendant's arguments. Go in the same order as the arguments*
3 *were made in Defendant's Motion, if possible.]*

4 Defendant's argument is "Barred by previous settlement agreement". Exhibit 1B page 1, line 3

5
6 The settlement agreement between Defendant and Plaintiff is dated October 27, 2017.

7 The claim by Plaintiff is related to discrimination by Defendant's managers for contractor positions
8 from July 2019. Settlement agreement does not apply to this claim.

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OPPOSITION TO MOTION TO DISMISS

CASE NO.: 19-30088 ; PAGE 3 OF 4 [JDC TEMPLATE – rev. 2017]

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[If this document is longer than ten pages, you must include a table of contents and a table of authorities.]

[You must sign and date.]

Date: 7/13/2021

Sign Name: 

Print Name: L. C. Chappell

OPPOSITION TO MOTION TO DISMISS

CASE NO.: 19-30088

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CERTIFICATE OF SERVICE OF DOCUMENT OTHER THAN COMPLAINT

** You must serve each document you file by sending or delivering to the opposing side. Complete this form, and include it with the document that you file and serve.**

1. **Case Name:** L. C. Chappell v. PG&E Corporation, and

2. **Case Number:** 19-30088

3. **What documents were served?**

Opposition to Motion to Dismiss

4. **How was the document served?** *[check one]*

☒ Placed in U.S. Mail

☐ Hand-delivered

☐ Sent for delivery (e.g., FedEx, UPS)

☐ Sent by fax (if the other party has agreed to accept service by fax)

5. **Who did you send the document to?** *[Write the full name and contact information for each person you sent the document.]*

KELLER BENVENUTTI KIM LLP

650 California Street, Suite 1900

San Francisco, CA

6. **When were the documents sent?** 7/13/2021

7. **Who served the documents?** *[Whoever puts it into the mail, faxes, delivers or sends for delivery should sign, and print their name and address. You can do this yourself.]*

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Signature:

Name:

Address:

L. C. Chappell

PO Box 1411

Morgan Hill, CA 95037

CERTIFICATE OF SERVICE *[JDC TEMPLATE Rev. 05/2017]*